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January 20, 2012

Mr. Raymond Klimcsak
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

RE: Response to USEPA and NJDEP October 13, 2011 Groundwater Comments, March 1, 2011 *Evaluation of Soil, Sediment, Surface Water and Groundwater Results, and Proposal for Additional Site Characterization* and June 1, 2011 *Work Plan for Additional Groundwater Characterization*

Revised Work Plan for Additional Groundwater Characterization

Sherwin-Williams/Hilliards Creek Site- Former Manufacturing Plant
Gibbsboro, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035

Dear Mr. Klimcsak:

This CD contains the electronic versions of the text, tables, figures and appendices related to the June 1, 2011 *Work Plan for Additional Groundwater Characterization* as well as the response to USEPA and NJDEP October 13, 2011 Groundwater Comments.

The folder titled "June 2, 2011 Report" contains pdfs of the previously submitted report. The folder titled "January 20, 2012 Report" contains pdfs of the related text, figures, and appendices. The tables are provided as Microsoft Excel spreadsheets in a read-only format, as the October 13, 2011 comment letter included the request that future submissions utilize a format for the tables that allows the reader to navigate and assess the data in a manner more user friendly than that of a pdf. Additionally, Figure 14 from the 2011 submission has been updated for the 2012 report, but the Figure 14 in the 2011 folder is the version included with the original submission. No other revisions have been made to previously submitted documents.

In addition to the text, the June 1, 2011 Report folder contains:

Tables Folder

- Table 1 Groundwater Monitoring Wells - Bottom Depth and Screened Intervals Summary
- Table 2 Groundwater Monitoring Wells - Top of Casing Elevation, Depth To Water, and Calculated Water Level Summary – Fall 2009 and August 2, 2010
- Table 3 Groundwater Monitoring Wells - Top of Casing Elevation, Depth To Water, and Calculated Water Level Summary – April 14, 2011
- Table 4 Groundwater Monitoring Well Sampling - All Results
- Table 5 Groundwater Monitoring Well Sampling - Exceedances of NJDEP Class II-A Ground Water Quality Standards for Groundwater Samples
- Table 6 Groundwater Monitoring Well Sampling – Summary of Free Product Measurements
- Table 7 Groundwater Monitoring Well Sampling - Field Collected Water Quality Indicators Parameters Summary

Figures Folder

- Figure 1 Site Location Map
- Figure 2 Site Map
- Figure 3 Study Areas with Historical Map Overlay
- Figure 4 Geologic Cross-Sections – A-A', B-B' and C-C'
- Figure 5 Monitoring Well Location Map
- Figure 6 Groundwater Contour Map – Shallow/Intermediate Monitoring Wells – August 2, 2010
- Figure 7 Groundwater Contour Map – Deep Monitoring Wells – August 2, 2010
- Figure 8 Groundwater Contour Map – Shallow/Intermediate Monitoring Wells – April 14, 2010
- Figure 9 Groundwater Contour Map – Deep Monitoring Wells – April 14, 2010
- Figure 10 Shallow/Intermediate Monitoring Wells - Groundwater Samples - Exceedances (All Parameters) {NJDEP GWQS}
- Figure 11 Deep Monitoring Wells - Groundwater Samples - Exceedances (All Parameters) {NJDEP GWQS}
- Figure 12 Benzene Concentration Isopleth Map – Shallow/Intermediate Monitoring Wells – August 2010
- Figure 13 Benzene Concentration Isopleth Map – Deep Monitoring Wells – August 2010
- Figure 14 Proposed Monitoring Well Investigation Map

The January 20, 2012 Report folder is organized in the same fashion as the June 2, 2011 folder:

Tables Folder

- Table 1 Groundwater Monitoring Wells - Bottom Depth and Screened Intervals Summary
- Table 2 Groundwater Monitoring Wells - Top of Casing Elevation, Depth To Water, and Calculated Water Level Summary – Fall 2009 and August 2, 2010
- Table 3 Groundwater Monitoring Wells - Top of Casing Elevation, Depth To Water, and Calculated Water Level Summary – April 14, 2011
- Table 4 Groundwater Monitoring Well Sampling - All Results
- Table 5 Groundwater Monitoring Well Sampling - Exceedances of NJDEP Class II-A Ground Water Quality Standards for Groundwater Samples
- Table 6 Groundwater Monitoring Well Sampling – Summary of Free Product Measurements
- Table 7 Groundwater Monitoring Well Sampling - Field Collected Water Quality Indicators Parameters Summary
- Table 8 FMP Groundwater Investigation - Proposed Shallow Groundwater Sampling Summary
- Table 9 FMP Groundwater Investigation - Proposed Soil Sampling Summary
- Table 10 FMP Groundwater Investigation - Proposed Monitoring Well Sampling Summary

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- Figure 10 Shallow/Intermediate Monitoring Wells - Groundwater Samples - Exceedances (All Parameters) {NJDEP GWQS}
- Figure 11 Deep Monitoring Wells - Groundwater Samples - Exceedances (All Parameters) {NJDEP GWQS}
- Figure 12 Benzene Concentration Isopleth Map –

- Shallow/Intermediate Monitoring Wells – August 2010
- Figure 13 Benzene Concentration Isopleth Map – Deep Monitoring Wells – August 2010
- Figure 14 Proposed Shallow Groundwater and Monitoring Well Investigation Map (Revised January 20, 2012)
- Figure 15 Innovative Investigation Technology Decision Matrix (Seep Area and MW-30 Area)

Appendices Folder

- Appendix A *“Attenuation of Naturally Occurring Arsenic at Petroleum Hydrocarbon-Impacted Sites”* by Brown, et al (2010).
- Appendix B Schedule of Proposed Investigation Activities

Should you have any questions or comments, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,



Mary Lou Capichioni
Director, Remediation Services